

this informative film that has received an M rating, instead of the sexual humor in "Seinfeld" that has been labeled TV PG, or the romantic escapades that occur in soap operas such as "General Hospital" or "Beverly Hills 90210" which have also been rated TV PG.

A third issue concerning the new television ratings system involves the exposure of the ratings. The ratings are shown on the left hand corner of the screen for an average of 15 seconds in the beginning of each program. They are small and certainly not overly conspicuous. They are only revealed in this initial fifteen seconds unless the program is over an hour long. In this case, they reappear in the beginning of the second hour for another short period of time. The ratings are far from sufficiently exposed. They do not accommodate the way Americans watch television. Many of us turn on the television in the middle of a program. Even if we turn on the television at 8:01, we may have missed the ratings. How can parents regulate their children's television viewing if it is so difficult to catch the ratings? It may seem implausible to expect television broadcasters to keep the ratings on the screen for an entire program. Perhaps they could be shown after each commercial break. Currently exposure is insufficient, and any improvement to the ratings system will be meaningless without proper airing of these ratings.

To summarize my opinions regarding the new television rating systems, I make the following recommendations: 1. The ratings system should be changed from an age based system to a content based system. 2. Regardless of whether the ratings are based on age or content, the networks should be forced to rate programs in a more stringent fashion. In other words, the majority of programming should no longer be rated TV PG. The networks should make a concerted effort to more accurately label their programs. 3. The ratings should be exposed for longer periods of time and more often. A suggestion is after each commercial break. I believe that the current rating system is a positive step in the right direction. I am also aware that change to this system is a complicated process that

takes time and deliberation. I hope that my recommendations will be both useful and justly considered by the members of the FCC.

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A handwritten signature in cursive script, reading "Erica Kay". The signature is written in black ink and is positioned to the right of the "SUBMITTED BY:" label.

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CS 97-55

IN THE MATTER OF: The television ratings system

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COMMENTS:

The new television ratings system has been a point of much interest to myself, the parents and children with whom I work both as a substitute teacher in the public school systems and a childcare provider, and professors and colleagues of mine in my masters program. While the system is evidently a major step in the revamping of television and its suitability for children viewers, the system currently is inadequate for the following reasons: 1) the amount of time the television ratings is posted is insufficient time for a viewer to choose among a number of shows; 2) by using the descriptions of the rating labels, episodes do not appear to be rated appropriately; 3) the ratings do not adequately give the viewer enough information to decide whether a show is appropriate for children; and 4) there is very little to no information concerning any given show's ratings before it appears in its time slot. The aforementioned points will now be discussed in detail.

The amount of time an episode's rating is aired appears to be roughly fifteen seconds, with some networks, such as the Fox network, providing up to thirty seconds. The ratings are flashed at the very beginning of the show, often before the opening credits are shown. The difficulty then lies in trying to find out the ratings to a number of shows being aired in the same time slot. If, for example, a parent wanted to find a show with a G-rating during the eight o' clock hour, the parent would only be able to find maybe one or two show's ratings within the fifteen seconds the rating is aired. It is curious that networks often flash their own symbol when a show returns from a commercial break for variable lengths of time, from a few seconds to a few minutes. As subtle as the symbol is, the symbol does register in

the viewer's mind. The reason for the symbol remains interesting, however, especially since a viewer can as easily check his/her television dial to determine what channel he/she is watching. But, in the same respect, the viewer cannot determine the important rating of the episode without having caught the first few seconds of the show.

Another issue is the appropriateness of the ratings. Ratings change from episode to episode as they should, due to the various issues a show may address in any given episode. It is the rating of any particular episode that seems to be inaccurate. *Cheers* is shown in syndication on the UPN network in Boston weekdays at 12pm and 12:30pm. The show is generally given a TV-G rating. On February 10, 1997, an episode of *Cheers* included a reference to a character having had sex in his car. The reference was not hidden in double entendre, but instead clearly mentioned. When the show was taken off NBC, it had aired Thursday nights at 9pm. Shows on the current Thursday night lineup from 8pm to 10pm generally receive a rating of TV-PG. Among these shows are *Friends* and *Seinfeld*. Both shows should be receiving a rating of at least TV-14. *Seinfeld* spends entire episodes discussing masturbation and oral sex, while *Friends*, which airs at 8pm, recently broadcasted an episode where two male characters were discussing, in moderately subtle terms, the conditions of a hypothetical ménage à trois (*Friends*, NBC, 2/13/97). Simply because all of the above mentioned shows are comedies does not give these shows the license to be aired with a mild rating of TV-PG. An adult would experience much difficulty explaining to a curious child under the age of fourteen what the double entendres concerning a ménage à trois actually address.

The main problem may lie with the FCC decision to have the ultimate decision of an episode's rating to lie with the local network (Kunkel, *The Chronicle of Higher Education*, 1/31/97). Frederic M. Biddle, a reporter for the *Boston Globe*,

writes,

Executives of NBC, CBS, ABC and Fox all said, in interviews or through spokesmen, that their networks won't rate any of their series TV-M, mature audiences only, the most restrictive of the six ratings that the networks themselves devised with other industry representatives. (Biddle, Boston Globe, n.d.)

Dale Kunkel theorizes why this may be so,

*Imagine the economic implications for broadcasters if people who didn't want their children to see violence on TV actually had an effective way of blocking out all violent programs. Ratings would go down and advertising dollars would decline.
(Kunkel, The Chronicle of Higher Education, 1/31/97)*

Kunkel may say the same towards the sexual content of television. But, who are the networks serving? Are they serving the viewing public or the advertisers?

President Clinton is quoted saying "...television should serve the educational and informational needs of our young people" (Reuters, Boston Globe, 7/30/96). In realistic terms, the ratings system has not accomplished these needs.

The third issue is the format of the ratings system. Age appropriateness does not seem to work for television. The TV-G and TV-Y ratings do not provide unambiguous descriptions as to what makes the two different from each other:

*TV-Y: **All Children.** Program is suitable for all children. It shouldn't frighten younger children.*

*TV-G: **General Audience.** Program is appropriate for all ages. It contains little or no violence, no strong language, and little or no sexual dialogue or situations.*

(Kunkel, The Chronicle of Higher Education, 1/31/97).

While movies employ age appropriate ratings, the specific reasons for a movie's ratings can often be found in newspaper blurbs that describe the movie's content. This often includes whether the movie contains and to what degree violence, sex, and profanity. As one television viewer noted in a personal discussion, television ought to have stricter descriptive ratings than movies, because while one makes a

conscious and often careful decision to pay high movie ticket prices, television is free and more easily accessible to children (J. Tavares, 2/15/97).

Some networks do provide more information as to why an episode is assigned a certain rating. For example, the Fox network will air before the cartoon *The Adventures of Batman and Robin*, which airs weekday afternoons during the 'Fox Kids Club,' a message stating that the episode is rated TV-Y7 because it is a "superaction drama." Other shows such as the *X-Files* on the Fox network will state in commercials that parental discretion is advised due to violent content. This practice however is not consistently used in all shows that contain violent content. The practice of providing more information other than the assigned rating has been used by some cable networks such as HBO for many years (Biddle, *Boston Globe*, n.d.). While cable networks do not have to answer to advertisers, Fox has used a similar system with some of their shows and do not appear to fear the advertisers or the use of air time to include the added message concerning a show's content.

The last issue is the availability of the ratings of an episode other than the few seconds of the beginning of a show. Personally having Cablevision, the Prevue channel is a channel included in the package which indicates what shows, both cable and commercial network, are on in any current hour and a half time block. At times, an episode will list its television or movie rating. The practice is inconsistent, however. It may depend on if the title and the rating will fit in the assigned grid space on the screen. When the rating does manage to appear, it proves very helpful. It would also be helpful if these ratings would be printed in weekly newspaper television guides. A parent or caregiver would then have tools to plan or monitor a child's television viewing.

As mentioned earlier, Fox shows at times will advertise an upcoming show providing its TV rating and when seen fit a message for parental discretion. At the

end of an episode, NBC's very popular *ER* has shown previews of the following week's episode with the television rating. Commercials often appear with the networks logo, so why not the television rating? Any tool that can be of use to a child's television viewing would be of great value.

Another useful tool would be distributing materials to preschools and elementary schools defining the labels of the television ratings system. The disbanded parent group, Action for Children's Television (ACT) led by Peggy Charren, worked extensively to educate the public of the provisions put forth in the 1990 Children's Television Act by distributing information and creating a videotape explaining the law (Berry and Asamen, *Children and Television*, 1993, p. 283). Such measures would be another valuable tool.

Being a childcare provider and a future parent, plus having interests in making a career of television production, the state of television is personally of great importance. It is difficult as is trying to find television that is appropriate for children without having to preview every show before deciding whether it is suitable for a child's viewing. The power of television is immense. While it is important not to infringe on the right of a person to choose what to watch, it is important to give the person a right to know what the choices are. Those in charge of helping a person make that decision should be an educated group of people concerned with the welfare of the viewing public, especially the viewing children. Network managers concerned with advertising monies should not be left solely to decide for the public. It is my hope that my comments and that of others will be helpful in fine tuning the monumental step of television ratings.

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APR 22 1997

Federal Bureau of Investigation
Department of Justice

IN THE MATTER OF: The new television ratings system

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Tufts University Graduate student in Child Development

COMMENTS: This is a critical assessment of the present television ratings system.

The issues addressed are: the system being age-based and not content based, if parent's have enough information to make informed decisions, the issue of networks rating their own shows and the inconsistencies caused from this, the amount of time the icon is aired, what constitutes a news show, motives of television industry, why commercials are not rated, and concluding with studies expressing what the American people want in a television rating system.

The present television rating system is of great interest to me because I will soon be working with children and families and for personal reasons. According to Kunkel, most children spend 1,000 hours a year watching television (1/31/97, p.1). What children are exposed to on television can and does greatly effect them. Kunkel says that there is evidence that children who are exposed to violence on television tend to have more aggressive attitudes and behaviors, are desensitized to the victims of violence and to fear among children (1/31/97, p.2). There is a mass of evidence proving that viewing violence on television has dangerous consequences for children. Because of all this it is obvious how vitally important it is to have some sort of ratings system to help protect our children.

The V-chip television rating system is at least one step toward trying to protect children. However, there are many issues that must be addressed concerning this new system and changes that need to occur in order for it to be effective and beneficial. The most obvious issue is the fact that this ratings system is age-based and not a content based descriptive system. With this system the ratings do not tell a person if a show contains violence, sex or adult language. One cable network, HBO, does express before a show if it has sex, violence or adult language. The idea of the v-chip is for parents to have the ability to block television programs that have content that is inappropriate for their children. However, if the television content is not stated how can a parent know what to block out. As Kunkel says, "It's a bit like offering a weather forecast that says, 'Warning: severe weather approaching,' without telling you whether to expect rain, snow, wind or fog. The details aren't important: just be careful out there" (1/31/97, p.1). This ratings system is also based on deciding what is acceptable for all children of specific age groups. No two children are the same so therefore no universal standard is appropriate for all children of the same age (Kunkel, 1/31/97, p.2). Parents need to know why a program has a particular rating to make an educated, informed decision on whether their child should watch that show. This rating system fails to provide the information necessary to parents and families.

Another issue is the fact that the networks rate every episode of their own shows. Harvard professor John Livingstone says, "There's no protocol to guide the dozens of people at the networks who are making these decisions every day" (Biddle, n.d, p.n7). This has lead to a lot of inconsistencies. For example CBS rates "The Late Show With David Letterman" PG and NBC rates "Tonight With Jay Leno" TV-14 (Biddle, n.d, p.n6).

So two relatively similar shows have drastically different ratings. Plus, each episode can have a different rating. For example the show "Geraldo" airing on NBC on February 14, 1997 had a rating of G but on other days has had different ratings such as PG. Parent's may see a rating for one episode and not realize that it can change from show to show. Also, why one episode is rated G and one PG is not explained.

With this ratings system there are six rating icons. According to Biddle, "One of six rating's icons will be shown in the upper left-hand corner of the television screen during the first 15 seconds of all non-news, non-sports programs..." (12/30/96, p.1). This is a major issue. The icon is shown so quickly that it is easy to miss it. If a person is a couple of seconds late to a show he or she would have missed it all together. As Biddle points out, networks have their own identification icons in the lower right-hand corner of the television screen and they often are seen after commercial breaks along with at the beginning of a show (1/3/97, p.D1). If these icons can be shown so often then why can't the rating's icons also be aired more frequently? If they were shown periodically throughout a show then it would be more difficult to miss the rating. Another thing to take into consideration is the idea that shows such as "Inside Edition" and other news entertainment shows do not have to be rated. This needs to be addressed. There must be a better definition of what constitutes a news show. These shows are racy and air at a time when children may see them. This is why it is vital these shows be given a television rating.

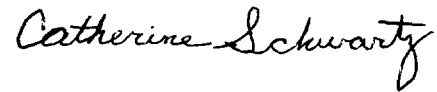
It is important to consider the motives of the television industry with this rating system. By providing ratings that are unclear they minimize any economic implications. If there really was a way for parents to block violent content, ratings and the advertising dollars would go down. So this is an economic issue. As reported by Biddle, Rev. Donald Wildmon's American Family Association, says it plans to boycott sponsors of TV-M and TV-14 shows (Biddle, n.d, p.N6). This shows there is a lot at stake for the networks. These are issues that need to be looked at when considering the motives of some who want to keep this system in place.

Another important issue is the fact that commercials are not rated. If a young person is watching a show with a G rating the parent may believe the child is protected. However, when the commercials air, if they were rated, are not necessarily of the same rating. For example, commercials during a G rated show, should never exceed the G rating themselves. This is an issue that should be addressed immediately.

This system was to be for the American people. Then why do we not listen to what they want? The people want a content based descriptive system. This would enable parents the knowledge of the degree of violence, sex, and adult language a show has to make an informed decision regarding their child's viewing. Plus, a study by the National Parent Teacher Association found that 80 percent of parents want this type of system and a study the Media Studies Center by the University of Connecticut's Roper Center for Public Opinion Research also found 79 percent of parents wanted this content based system (Kunkel, 1/31/97, p.2). These studies prove what the people want. It is time to start listening. A big step was made but now it is time to go further and improve this ratings system to make it for the people. After all one of the goals of a television ratings

system is, "... to provide parents with as much information as possible, in as simple and understandable a format as possible" (Children Now, 1996).

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IN THE MATTER OF : The new television ratings system.
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APR 22 1997

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COMMENTS: In this paper, I have looked into six different problems facing the new rating system and tried to present a vague solution supported by many experts in the field. The problems that I have encountered so far are, age-based ratings system, the short duration of the rating icons appearing on the screen, difficulty in decoding due to lack of public education, inconsistencies in the application, and the way in which the networks themselves rate their own programs showing contradiction among networks.

It has been nearly two months since the controversial television ratings system has been adopted. Although it is believed to be a giant leap in children's television history, it bears within, without any doubt, many problems that needs to be solved before the one year trial period is over.

The goal of the rating system should be to provide parents with as much information as possible, in as simple and understandable format as possible (Children Now, 1996). So far, it does not seem to be doing a very good job in providing adequate information. There are a few elements that prevent this system from being as useful and informative as it should be. First, these new ratings are age-based. As many experts have emphasized even before the system was launched, it is important that the ratings should not only inform the age-appropriateness of the programming but also ratings for specific content as violence, sexual content, and adult language (Children Now, 1996). By doing so, the ratings can really help the parents in determining the appropriate program for their children to watch. The new rating system rely solely on judgment of the producer about the suitability of the program's content in accordance with children of different ages (Kunkel, 1/31/97). It does not indicate in any ways, the content of the show. If a show were given a rating of a TV-PG,

one would not know whether it was due to sexual, violent materials or adult language. As no one universal standard is appropriate for all children of the same age (Kunkel, 1/31/97), no one can say that a same value is shared by all people. Thus, by giving the information of a program of its contents to the viewers, it enables them to judge the program itself and decide on what is appropriate for their children. It gives the decision power to the parents rather than to the television industry. The new ratings system is giving the vaguest information concerning that it will result as a reduced number of viewers which in turn will mean a decline in advertising dollars. Clearly, this new age-based ratings serves the needs of the television industry, but not the needs of America's children and families (Kunkel, 1/31/96).

Second, the short duration of the ratings icons appearance. As the TV Ratings Implementation Group has decreed, viewers are given the first 15 seconds of a program to catch the ratings icons. If you miss the opening of the show, you could end up having to wait another week just to catch the ratings of that show. Without any explanation, it is obvious that most viewers are not sitting around the set waiting for the opening credits. What is the whole point of any system if it is not even available? It is interesting to note how often and regularly the networks broadcast identification icons in the right-hand corner of the screen (Biddle, 1/3/97). No matter which part of the show you happen to tune in, the chance of missing the network identification icons is slim to none.

Third, the lack of industry investment in public education. If you do not understand what each ratings stand for, it is just another useless symbol that stands for nothing. In order for the system to be a success, all parents should be given a chance to understand the system. To this date, not much effort on public education campaign is to be seen on television networks. People who are not in close contact with media other than television, have a very good chance of not understanding the exact meaning of each rating icon in the system.

Fourth, the inconsistency of ratings on different segments of a program. It is probably inevitable that some shows receive different ratings for different segments, since you cannot force a show to evolve around the exact same content all along. Maybe this is a problem that has to do with public education. If parents are informed that the ratings could change even in the same program, they would not make the mistake of assuming that a program is suitable for their children once they see a rating of an episode. A series usually rated as TV-PG can one day take a TV-14 rating according to the content of the episode as was the case with "Homicide: Life on the Street" which aired on January 3 1997 on NBC (Biddle, N/D). If you do not pay close attention, it might one day take you and your children by surprise.

Fifth, contradiction in rating system among similar programs. While NBC has decided to give Jay Leno's "The tonight show" a rating of TV-14, CBS rated its "Late night show with David Letterman" with TV-PG (Biddle, 1/3/97). This can be confusing and misleading to the viewers. This is the problem that is brought about by the fact that the ratings rely upon the networks themselves, which I would state as the sixth problem and one of the more serious one.

Sixth, ratings that rely solely on their own networks. The problem that this way of system imposes on the ratings can be recognized as the networks have given the second-mildest rating-TV-PG to nearly two-thirds of their prime-time dramas (Biddle, N/A). Considering that nearly all the sitcoms and certain episodes of shows like "Melrose Place" and "Law & Order" received TV-PG ratings, the system of rating in which the networks adopt has some kind of a problem. These programs tend to contain more sexual content, strong language and intense violence than other programs that might be rated as TV-PG. Executives of NBC, CBS, ABC and FOX all said that they would not rate any of their series TV-M (Biddle, N/A), with an exception of "Schindler's List," which will air on Sunday, February, 23, on NBC. Many experts strongly voiced their opinion that the ratings should be based on scientific information available from the study of child development,

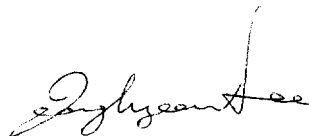
rather than on perceived parental norms (Children Now, 1996). When it is based on the perceived norms of the industry, as it is now, the result reveals more problematic system of ratings. David Kleeman, executive director of the American Center for Children's Television advised that " the rating system should reflect the best knowledge about child development. Whether you build it around age-based ratings or around describing content, the more you understand about how children perceive the world around them and what they are capable of understanding, the better it will serve young people and families" (Children Now, 1996). I would like to ask each network how much they understand children and how much of that understanding they base on when they rate their own programs.

Here are some of the recommendations concerning the above problems. First of all, it should be a content based descriptive system as noted above, if the rating system is to be of a help to the families. For many years cable networks like HBO, have aired detailed warnings of sex, violence and coarse language before their shows (Biddle, N/A). Television networks should be able to do the same. Once it becomes content based descriptive system, the context in which violence or sexual content is shown should be taken into account. The factors that the experts agree on as most important were the degree of graphic and its intensity. For example it is important to take into account whether the consequences of the action in question are shown, whether the perpetrator of violence is treated as a hero, whether the violent behavior is rewarded or punished, whether the content is integral or important to the story or just tacked on, and whether violence is glorified or made to seem exciting (Children Now, 1996). Not as explicit as we would like it to be, but none the less there were a couple of shows that were informing the audience with the content of the show. "Robocop" that aired on Saturday, February, 15, on WB56 gave the warning of parental guidance and viewer discretion due to violent content. Weekly series of "Cops" that was also on Saturday,

February, 15, on FOX included the content warning in addition to the TV-PG ratings. It made much more sense and made it clearer to understand and make my own judgement. Secondly, problem of the short duration of the ratings appearing on the screen can be supplemented by airing it several times throughout the show, like the "Oprah Winfrey Show" on Friday, February, 14, on NBC as well as "Robocop" on WB56 mentioned above. After commercial breaks they aired the rating icons or the descriptive warnings and thus, made it hard to miss even if you missed the first part of the show. Third, the networks should be made to invest more into educating the public on the issue of ratings, through the television media so that even to people who are not familiar with other types of media, the information is readily available. Fourth, the inconsistencies of ratings among programs and series can be solved when the problem of relying solely on the networks themselves to rate their own programs is solved. Instead of the networks and syndicators rating their own programming, an independent board including experts in media and child development , parents and the industry personnel should be the core of the rating system.

The ratings system by no means, ensure the high quality and quantity of programs that are suitable for children, but at least it is an aid to a decision of a better and more responsible viewing, for the families and every children. Hopefully, the system triggers a more responsible development of programming among the networks.

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IN THE MATTER OF: The new television ratings system

APR 22 1997

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COMMENTS:

Summary:

In studying to work in the field of education, it has been brought to my attention that the new television ratings system needs improvements. Throughout television history, Congress and the FCC have singled out children's television for special consideration (Charren, p.12). In January 1997 an attempt was made for all of television to be singled out with the implementation of the ratings system. In rating the ratings, the new system is a step in the right direction, yet should still be "a work in progress" (Biddle, p.N6). It is important to guide the television audience with a national ratings system, but the existing system needs to be revamped and re-evaluated because it is limited and vague. It appears that many issues have not been considered in the implementation of the new television parental guidelines. In both my observations from my own television viewing and through literature that I have read it is apparent that the ratings:

- do not sufficiently provide descriptions of the symbols designed to rate television programs,
- were determined solely by the television industry,

- inadequately "employ age-based advisories" as opposed to content-based warnings (Kunkel, 1/31/97), and
- are not applied consistently.

Insufficient Descriptions:

The basic premise of the guidelines appear to work, in so much as the symbols are apparent and easy to read. However, it is not clear how viewers can make sense of the television ratings without sufficient information as to what each symbol means. Descriptions about the ratings are not ample. In searching for an explanation about what each symbol (TV-Y, TV-Y7, TV-G, TV-PG, TV-14, and TV-M) was designed for, I discovered that TV Guide was a single source which outlined the ratings system. Even major newspapers, for example, The New York Times, did not publicize program ratings. If the public is unable to decipher what the symbols mean, how is this system to be decoded? It is necessary to inform viewers about how the system was determined and how it is being applied. It should be the obligation and responsibility of the industry to provide adequate information on the meaning of the ratings system. The television audience needs to become familiar with the system in order to adequately adapt it. In saying that, the television industry should explain the system, define the ratings, and make the system and its meaning more visible. These descriptions of the ratings symbols should appear more explicitly in newspapers and on television since that is where the industry can reach its viewers.

Determination of the Ratings:

In devising a system without consulting the nation's parents, Congress left the decision about what categories to use entirely up to the television industry (Kunkel, 1/31/97). Parents wanted the ratings system instituted, and ultimately they should be the ones judging which programs are suitable for their children. Since research has determined that interpretation of the ratings vary, what is deemed appropriate for one family's children may not be appropriate for another family's children. These television viewers will decide for themselves what to watch, regardless of the rating system, especially since the "suitability of a show's content will rely solely on the program producer's judgment" (Kunkel, 1/31/97). Parents, not the industry, should make that determination based on their individual values.

Likewise, content not age should determine the ratings. Ratings would be more beneficial to the public if they provided as much as a clue as to why they are rated what they are rated. In eliciting the nature of their content, ratings of shows would be more precise. A system that classifies and grades violence, sex, and language content rather than one that determines what is age appropriate allows "parents to judge what material is most suitable for their children" (Kunkel, 1/31/97).

Inconsistencies:

Ratings have been inconsistent across stations and networks and during time blocks of programming. Even though

the FCC has no jurisdiction over commercials, those aired during programming and between shows should be reflective of the ratings that programs receive. Over the course of an hour show rated TV-PG, for example, commercials for marketing items and other television programs do not represent the TV-PG rating. The message that the television audience is receiving is that it is critical to rate the shows, but the commercials in-between need not benefit the guidelines. Television ratings should be analogous to the commercials that are aired during programming in order for the television industry to reflect the needs of children rather than to address the economics of the industry.

In creating these guidelines it is critical to remember that these are just guidelines that do not envelop the same meaning for all viewers. "Although people often agree about the messages and concrete details of television content, each viewer must himself or herself engage in information-processing, interpretive, and evaluative activities in order to determine what has been seen and what it means" (Dorr, 1986, p.21). Until the public feels well-enough informed, feels that they have had a voice in the matter, agrees with the content of the system, and thinks that it is a consistent method we will continue to "have an opinion about television's ratings system" (Biddle, p.N1).

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COMMENTS:

- * The icons are ineffective and difficult to decode.
- * The current TV rating system should be based on content rather than age.
- * Networks use the ratings system carelessly and inconsistently to protect their advertisers.
- * The age categories are too broad.
- * The age ratings will increase the amount of sensitive programming watched by younger children.
- * The TV industry should emulate the Time-Warner Cable "Direct TV" and/or HBO format that provides more than just ratings.

When a new system of television regulation is introduced into the public, there are bound to be some kinks. The initiatives to improve children's television viewing habits, that have launched side by side with the Children's Television Act of 1990, will hopefully encourage greater child advocacy movements within the television industry. However, as a future parent and creator of children's programming, I am concerned that the current ratings system will provide little, if any, assistance to parents in the regulations of sensitive and adult television programming.

The Ratings System

Let's face it. Chances are that the parents who have made an effort to understand the meanings behind the letter/number combinations are also the ones who do not need the ratings system. Parents who care enough about the amount and content of television watched by their children are already making efforts to curb the programs that come through their television sets. But these parents need more than just a general MPAA general movie-like rating, especially since the television is such an accessible medium of information for children. They need content markers and descriptors to help make their censoring process a little bit easier.

Cracking the ratings code is tricky, unless the definitions of each icon are cut out and pasted to the refrigerator. The rapidity with which these icons flash across the screen makes the decoding process even harder. If the goal of the ratings system is to help parents censor and monitor the programming that their children watch, then the ratings should be accessible to everyone and not just the people who make an effort to learn about them.

Age vs. Content

The age brackets, although useful when designing a program for children, are not helpful to parents who want to block out violent or scary content. Age appropriate ratings "hide the descriptive information from the public by filtering it with the television industry's judgment of what content is suitable for all children within a given age range" (Kunkel, 1/31/97: p.2). Allowing networks to rate the age appropriateness of their shows rather than the content, gives them the power to undermine the role of the parent by imposing an opinion of acceptable or unacceptable programming for each age group. With an age based rating, parents have no way of knowing about the material in the programs and are forced to watch the show, analyze the content themselves and *then* decide if it is appropriate for their child.

Unfortunately for this system, not all children develop intellectually or emotionally according to their age. Children with learning disabilities and developmental delays may not fit into their age categories and will fall outside of the television guidelines. A neutral, unbiased ratings system based solely on content (i.e. violence, sex, language) would really force networks to evaluate their programming material and would prevent them from carelessly throwing around age classifications. The Dean of the Annenberg School for Communication, Kathleen Hall Jamieson, pointed out that "when we buy a candy bar we can read the label to check for ingredients which may provoke allergic reaction. We should be able to do the same with TV viewing" (*Children Now*, 1996: p.4). The descriptions on content would help parents not only weed out the bad programs, but would help them spot the educational ones as well. We need to know, before we view it, if the program is going to be offensive or harmful.

Consistency of the Ratings

Fifteen seconds at the beginning of a program does not give parents enough time to a) see the ratings icon or b) make an educated decision about the appropriateness of the show. This is an extremely ineffective format, especially if a particular episode, of an otherwise "acceptable" program, has been given a higher rating. Some shows like, "Home Improvements," display the TV-G icon for two long minutes while other shows like, "Melrose Place," and "The Simpsons," are only showing their TV-PG icon for fifteen seconds. Programs that fluctuate in content like, "The Simpsons," and "Law and Order" need to hold their icons in place for a longer period of time.

The ratings are also too general. One prime-time sitcom like, "Seinfeld," will have the same TV-PG rating as "NYPD Blue" when their content is completely different. If parents have to struggle with how to distinguish between two TV-PG programs then the ratings system is not doing its job. "The networks have given the TV-PG rating to nearly two-thirds of their prime-time dramas like 'Melrose Place,' 'Law and Order,' and 'Homicide,' and nearly all of their sitcoms" (Biddle, 1/23/97: p. N1). The result will be a null ratings system with absolutely no function. If viewers cannot trust the icon, there is no reason for them to exist.

It is also difficult for networks to properly rate their own programs when advertisers threaten to pull financial support from shows that have ratings higher than TV-PG. There is a stigma against advertisers associated with violent or sensitive programming and there have been threats from the American Family Association to boycott products from these advertisers (Biddle, 1997: p.N1). A show that should be rated TV-14 like "David Letterman" isn't because

CBS does not want to lose money. Advertisers should not have the control over networks such that they can manipulate the ratings system to their benefit.

A more effective presentation of the ratings would be to display them before the program, at the beginning of the show for the duration of the opening, and then subtly throughout the episode. If the NBC, ABC, and CBS transparent icons can remain on the bottom corner of the screen for an hour long soap opera, then the rating icons can occasionally reappear during a sitcom or drama. It might also help to have preview icons during the commercials so that parents know about the upcoming programs before their children catch a glimpse.

Children's Response to the Ratings

Children are attracted to the "forbidden fruit" of entertainment, especially if their parents disapprove of the program. If the age ratings continue to exist in their current form, an *increased* number of children may begin to watch violent or sensitive shows because of their intrigue in "older" programming. Research done at the University of Wisconsin by Joanne Cantor suggests that boys are more attracted to age restricted programming than they are to violent content markers. They want what they cannot have and what their parents think is unsuitable (Kunkel, 1/31/97: p. 1). These ratings will not only *not* help parents decide what is good and bad TV, but they may encourage children to watch more violent programming.

Improvements to the System

With the introduction of Time-Warner's "Direct TV" system and with HBO's movie description format, there are many available models for a content-based ratings system. Television networks should use large content descriptions at the beginning of the show like "Direct TV" and HBO and then switch to smaller, less obtrusive icons during the show. These content descriptors should include plot, type of violence (physical or verbal), amount of graphic sex (none, some or a lot) and the amount of adult language (minimal, some or a great deal). They should also flag educational programs so that parents know what to watch as well as what *not* to watch. These descriptions should not only appear on the television screen before the show, but in the TV guide and in the newspapers.

The distinctions that have been made between the age groups labeled "young audiences," "7 and older," and "14 and older" are a crucial beginning because networks now recognize that children follow a developmental pattern of learning. Narrowing these categories even further, beyond the MPAA movie-rating system, would help parents decide what is and is not appropriate for their children. Combining the content rating formulas from the networks with better defined age designations from child professionals, would not only improve children's viewing habits but would educate parents on developmentally appropriate content. "There needs to be an educational agenda, a five to ten year process during which we use the rating system as a springboard for discussing parenting and what is appropriate for children at different stages of their development" (Thoman, in Children Now, 1996: p. 5). With the introduction of a media literacy program that teaches about developmentally appropriate TV, parents will feel less dependent on the television to tell them how to be responsible viewers.

In an ideal situation, parents are sitting down and enjoying these television programs with

their kids. This scenario makes the ratings system, as it is, easy and accessible. In a real world situation, however, parents and children aren't always watching television together and parents need a ratings system that will help them decide what programs to block out with their 1998 V-chip. Inconsistent ratings, vacant descriptions of programming, uninformative advertisements and vague categories will prevent parents from making educated decisions about what they should regulate.

Thank you for taking the time to read my suggestions and criticisms.

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